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December 3, 2024

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Center Street, Room 2202
New York, NY 10007

Re: *Hoffman v. Marex Services Inc., et al.*, Civil Case No. 24-CV-5299 (JMF)
***Consented Letter-Motion for Adjournment of Deadlines Re: Motion to Dismiss,
Motion to Amend***

Dear Judge Furman:

As the Court is aware, this firm represents plaintiff, David Hoffman ("Plaintiff") in the captioned action. We submit this letter on behalf of all parties. The parties have been engaged in extensive discussions regarding a number of matters relating to this case. The parties are now requesting that the currently scheduled date of December 3, 2024, for amendment to the Second Amended Complaint (SAC), which may take into account the issues raised in Defendant's pending motion to dismiss the unjust enrichment claim ("Motion"), to stipulate regarding same, or to oppose the Motion, be rescheduled to the currently scheduled date of December 23 (the 21st being a Saturday) for amending the SAC (to permit additional parties).

Defendants believe they may be able to produce the additional four documents referred to in the sale agreement, underlying the claims in this case, by this Friday, December 6, 2024. The

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parties have already been in communication with a Court-appointed mediator, for the mediation scheduled for December 18, 2024. We believe this requested rescheduling will allow the parties time to work out some differences and to maximize their efforts to resolve the case or, at a minimum, to streamline the areas of dispute and claims. The Requested adjustment to the deadline noted above will not affect any other dates in the Scheduling Order. (ECF No. 55).

Respectfully yours,

NORRIS MCLAUGHLIN, P.A.

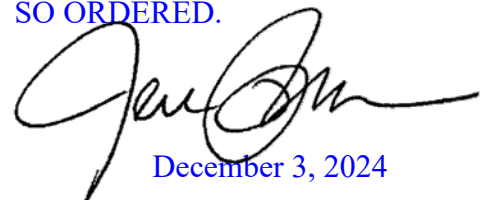
By: /s/ Edward G. Sponzilli
Edward G. Sponzilli
Counsel for Plaintiff

EGS:ds

cc: Howard Sokol, Matthew Caplan (VIA ECF)
Counsel for Defendants
Jeanne M. Hamburg, Esq, Benjamin D. Schwartz (VIA ECF)
Counsel for Plaintiff

Application GRANTED. The deadline for Plaintiff to file a Third Amended Complaint or oppose Defendants' motion to dismiss is hereby EXTENDED to **December 23, 2024**. Counsel are reminded that, per the Court's Individual Practices, any requests for adjournment must be made at least **48 hours in advance of the deadline** (absent an emergency). Further, the parties should not expect further extensions of this deadline. The Clerk of Court is directed to terminate ECF No. 60.

SO ORDERED.



December 3, 2024